

**SITE INSPECTION REPORT
LAB TECH INDUSTRIES SITE
DETROIT, WAYNE COUNTY, MICHIGAN
TDD No.: S05-0810-004
START Contract No. EP-S5-06-03**

December 12, 2008

Prepared for:

**U.S. Environmental Protection Agency
Emergency Response Branch, Region 5
9311 Groh Road
Grosse Ile, MI 48138**

Prepared by: _____ Date: _____
Greg Haas, START Project Manager

Reviewed by: *R. Baldino* Date: 12/15/08
Richard Baldino, START QA Manager

Approved by: *Raghu Nagam* Date: 12/15/08
Raghu Nagam, START Program Manager



STN Environmental, JV

125 South Wacker Drive, Suite 1180 • Chicago, IL 60606 • (312) 443-0550



December 12, 2008

Brian Kelly
On-Scene Coordinator
Emergency Response Branch
U.S. Environmental Protection Agency Region 5
9311 Groh Road
Grosse Ile, MI 48138

**Subject: Site Inspection Report
 Lab Tech Industries Site
 7707 Lyndon Avenue
 Detroit, Wayne County, Michigan
 Technical Direction Document No. S05-0810-004
 STN Environmental Joint Venture Contract No. EP-S5-06-03**

Dear Mr. Kelly:

Sullivan International Group, a member of the STN Environmental Joint Venture with TN & Associates Inc., is submitting the enclosed site inspection report for the Lab Tech Industries site in Detroit, Michigan. If you have any questions or comments about the report or need additional copies, please contact me at (517) 599-1875, or Raghu Nagam at 312-220-7005.

Sincerely,

Greg Haas
Project Manager

Enclosure

cc: Gail Stanuch, EPA Project Officer
 Raghu Nagam, START Program Manager

STN Environmental JV
125 South Wacker Drive, Suite 1180
Chicago, Illinois 60606
312.443.0550 phone 312.443.0557 fax

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TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION	1
2.0 SITE BACKGROUND	2
2.1 SITE DESCRIPTION	2
2.3 PREVIOUS INVESTIGATIONS	4
3.0 SITE INSPECTION ACTIVITIES	5
4.0 SUMMARY	6
 <u>Appendix</u>	
A PHOTOGRAPHIC LOG	
B FACILITY EPCRA SUBMITTAL	
C U.S. EPA NOTICE OF INSPECTION	

FIGURES

<u>Figure</u>	<u>Page</u>
1 SITE LOCATION MAP	3

1.0 INTRODUCTION

Under Technical Direction Document (TDD) No. S05-0810-004, the U.S. Environmental Protection Agency (U.S. EPA) tasked STN Environmental Joint Venture (STN), the Superfund Technical Assessment and Response Team (START) contractor, to conduct a site inspection at the Lab Tech Industries site located in Detroit, Wayne County, Michigan. START was tasked to (1) visit the site with the U.S. EPA On-Scene Coordinator (OSC) Brian Kelly and Michigan Department of Environmental Quality (MDEQ) Environmental Quality Analyst (EQA) Tim Sonnenberg, (2) document on-site conditions with written logbook notes and photographs (see Appendix A), (3) and provide technical assistance to U.S. EPA OSC.

This site inspection report discusses the site background (Section 2.0), site inspection activities (Section 3.0), and provides a summary of the site inspection (Section 4.0).

2.0 SITE BACKGROUND

This section provides site background information, including the site description, site history, and previous investigations.

2.1 SITE DESCRIPTION

The Lab Tech Industries (site) is located at 7707 Lynden Avenue in Detroit, Wayne County, Michigan, about 1/4 mile west of Livernois Avenue (see Figure 1). The site is currently active and located in an area bordered by residential properties to the north, active and inactive commercial/industrial properties to the east, west and south (see Figure 1). The property is currently owned by Dennis S. Bryce.

The building is used for the manufacture of various types of industrial cleaners as well as zinc phosphate. Materials used in the manufacturing process are stored within the facility. No outdoor storage of materials was noted during the site inspection.

FIGURE 1
SITE LOCATION MAP

2.2 SITE HISTORY

Lab Tech Industries is an active manufacturer of industrial cleaners and zinc phosphate for approximately 30 years.

2.3 PREVIOUS INVESTIGATIONS

Over the past three years, the site has been visited by the Detroit Fire Department to investigate a release of orange smoke (resulting from the accidental mixture of an amine material and nitric acid). The U.S. EPA Chemical Emergency Preparedness and Prevention Office (CEPPO) visited the site to investigate compliance with the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). The U.S. EPA Emergency Response Branch visited the site to perform a site inspection to determine compliance of the site with EPCRA. The MDEQ Waste and Hazardous Materials Division visited the site to investigate hazardous waste shipments from the facility.

3.0 SITE INSPECTION ACTIVITIES

This section summarizes site inspection activities conducted on October 30, 2008, at the Lab Tech Industries site. On October 30, 2008, U.S. EPA OSC Brian Kelly met with MDEQ representative Tim Sonnenberg and START member Greg Haas. Mr. Sonnenberg was on-site to perform an inspection on facility hazardous waste shipments.

U.S. EPA's Emergency Response Branch was contacted by the Detroit Fire Department to investigate the Lab Tech Industries site for compliance with the EPCRA Tier II program following the amine-nitric acid release. The Detroit Fire Department noted in their request that they had not received the annual report detailing the storage of hazardous and extremely hazardous substances at the facility. The site inspection activities began with a meeting with the facility owner Dennis S. Bryce and concluded with a site walk-through and record review. Site conditions and activities were recorded in the field logbook notes and photographed (see Appendix A). Upon conclusion of the site inspection, the facility provided U.S. EPA copies of the successful submittal receipts of EPCRA Tier II 312 and 302 reports to the Online Tier II Reporting System (Dated 10/7/08 and 10/9/08, respectively) as well as the chemical inventory, including storage quantities and facility map (see Appendix B).

During the meeting with the facility owner, U.S. EPA was informed that on June 18, 2008, the facility was visited by the Region 5 U. S. EPA CEPPPO Division to investigate compliance with EPCRA and Section 103 of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), (Appendix C - Notice of Inspection). START contacted Willy Pua and Bill Sandstrom of the Region 5 U. S. EPA CEPPPO Division to discuss the results of the site inspection performed on June 18, 2008. START was informed that the CEPPPO Division has determined that no further action will be required by US EPA on this issue.

4.0 SUMMARY

The facility has successfully submitted the appropriate documentation to the state agencies and fire department. U.S. EPA CEPPPO Division has investigated the facility for compliance under EPCRA and CERCLA Section 103 and has stated that “No Further Action” is required. Site inspection activities by U.S. EPA Emergency Response Branch determined compliance under EPCRA and did not note any spills or other environmental compliance issues. MDEQ is continuing to investigate the facility’s generator status.

APPENDIX A

PHOTOGRAPHIC LOG

(2 Sheets)

APPENDIX B
FACILITY EPCRA SUBMITTAL
(Five Pages)

APPENDIX C

US EPA CEPP0 NOTICE OF INSPECTION


(One Page)

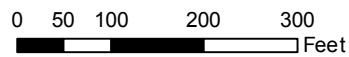


Lab Tech Industries Site



Legend

 Lab Tech Industries Site



Imagery: March 2005 Color Orthoimagery - Southeastern Counties, MI
 NAD 83 State Plane Michigan South

Map created November 18, 2008



Lab Tech Industries Site
Detroit, Wayne County, Michigan
TDD No. S05-0810-004

Figure 1
Site Location Map





Photograph No.: 1 **Photographer:** Greg Haas **TDD Number:** S05-0810-004
Site Name & Location: Lab Tech Industries, Detroit, Wayne County, Michigan
Date: October 30, 2008
Subject: Industrial cleaner manufactured on-site.



Photograph No.: 2 **Photographer:** Greg Haas **TDD Number:** S05-0810-004
Site Name & Location: Lab Tech Industries, Detroit, Wayne County, Michigan
Date: October 30, 2008
Subject: On-site manufacturing activities.



Photograph No.: 3 **Photographer:** Greg Haas **TDD Number:** S05-0810-004
Site Name & Location: Lab Tech Industries, Detroit, Wayne County, Michigan
Date: October 30, 2008
Subject: Acid Storage in Fiber AST's.



Photograph No.: 4 **Photographer:** Greg Haas **TDD Number:** S05-0810-004
Site Name & Location: Lab Tech Industries, Detroit, Wayne County, Michigan
Date: October 30, 2008
Subject: Waste Staging Area.

Corey Bryce

From: deq-ead-tier2@michigan.gov
Sent: Tuesday, October 07, 2008 4:26 PM
To: labtech@brycegroup.com
Subject: 2007 Tier II Annual Submission Certified - Online Tier II Reporting System.

This is an automated message from the Online Tier II Reporting System.

At 10/7/2008 4:25:31 PM, a Report Year 2007 Tier II Annual Submission was certified by username: akaottol for Labtech, MI SARA ID : 19560.

The Tier II Submission ID is 119604.

THIS WAS ALSO SUBMITTED
ONLINE FOR WILLY PUA'S
REQUEST (EARLIER THIS MONTH)

Corey Bryce

From: deq-ead-tier2@michigan.gov
Sent: Thursday, October 09, 2008 3:52 PM
To: labtech@brycegroup.com
Subject: 302 Report Certified - Online Tier II Reporting System.

This is an automated message from the Online Tier II Reporting System.

At 10/9/2008 3:51:31 PM, a 302 Report was certified by Username: akaottol for Labtech, MI
SARA ID : 19560

The 302 Report ID is 5592.

THIS WAS ALSO SUBMITTED
ONLINE (302 REPORT)

THIS WAS SUBMITTED TO WILBY PUA (EPA)
 AND HAROLD WATKINS (DETROIT FIRE DEPT)
 ON 7/14/2008.

U.S. EPA - REGION 5

Chemical Emergency Preparedness and Prevention Section

Facility Name: Labtech Corporation
 Facility Address: 7707 Lyndon
 City, State, Zip Code: Detroit, MI 48238

Inspection Chemical Inventory Form

Hazardous Chemical or EHS	Maximum Quantity (in pounds) on Premises At Any One Time During Calendar Year:			
	2005	2006	2007	CERCLA RQ
ALUMINUM SULFATE / 10043013	2,500	2,500	2,500	NO
BUTYL CELLOSOLVE / 111762	18,863	18,863	18,863	NO
CALCIUM HYPOCHLORITE / 7778543	300	300	300	YES
DIETHANOLAMINE / 111422	1,502	1,502	1,502	YES
DODECYLBENZENESULFONIC ACID / 27176870	972	972	972	NO
GLYCOL ETHER DPM / 111762	11,880	11,880	11,880	NO
ISOPROPYL ALCOHOL / 87630	3,894	3,894	3,894	NO
METHANOL / 67561	2,244	2,244	2,244	NO
METHYLPYRROLIDONE / 872504	8,488	8,488	8,488	NO
NICKEL NITRATE / 14216752	364	364	364	YES
NITRIC ACID / 7697372	8,883	8,883	8,883	YES
PHOSPHORIC ACID / 7664382	44,550	44,550	44,550	YES
POTASSIUM HYDROXIDE, LIQUID / 1310583	13,601	13,601	13,601	YES
POTASSIUM HYDROXIDE, POWDER / 1310583	500	500	500	NO
SODIUM BIFLUORIDE / 1333831	-	151	151	YES
SODIUM FLUORIDE / 7681494	200	200	200	NO
SODIUM HYDROXIDE, LIQUID / 1310732	15,950	15,950	15,950	YES
SODIUM HYDROXIDE, POWDER / 1310732	7,000	7,000	7,000	YES
SODIUM HYPOCHLORITE / 7681529	402	402	402	YES
SODIUM NITRITE / 7632000	5,000	5,000	5,000	YES
SODIUM PHOSPHATE, TRIBASIC / 10101890	7,000	7,000	7,000	YES
SODIUM PHOSPHATE, TRIBASIC / 7758294	2,000	2,000	2,000	NO
STEARIC ACID / 57114	50,000	50,000	50,000	NO
SULFURIC ACID / 7664939	3,100	3,100	9,115	YES
TERGITOL NP-10 SURFACTANT / 26027383	17,716	17,716	17,716	NO
ZINC OXIDE / 34590948	60,000	60,000	60,000	NO

TEN
VACANT OFFICE

TEN
VACANT OFFICE

TOOL ROOM



MAINTENANCE AREA

BULK DRINK STORAGE

CENTURY TOPE STORAGE

OSOLON CONTAINERS

CEILING



DOOR

DOOR

PALETS AND GALLONS
PALETS
OVER FLOW

OVERHEAD DOOR

OVERHEAD DOOR

SMALL PACKAGING AREA

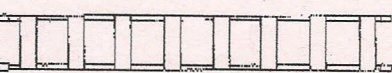
TOTES
OTHER
STORAGE

CENTURY FINISHED GOODS

CENTURY FINISHED GOODS

STORAGE OVERFLOW

POWDER RAW MATERIAL



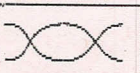
OSOLON
STORAGE

DRIFT METAL
TANK STORAGE

FLAMMABLE
STORAGE



SMALL TANK STORAGE



DOOR

EXIT

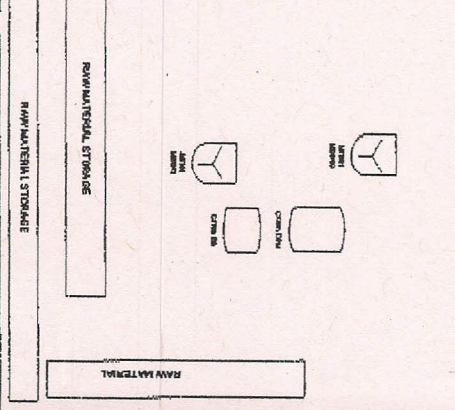
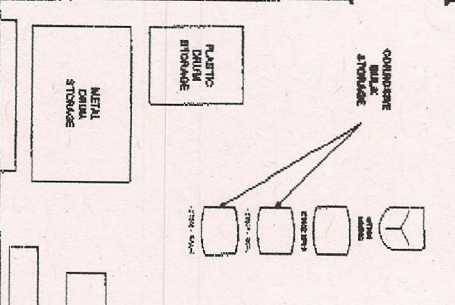
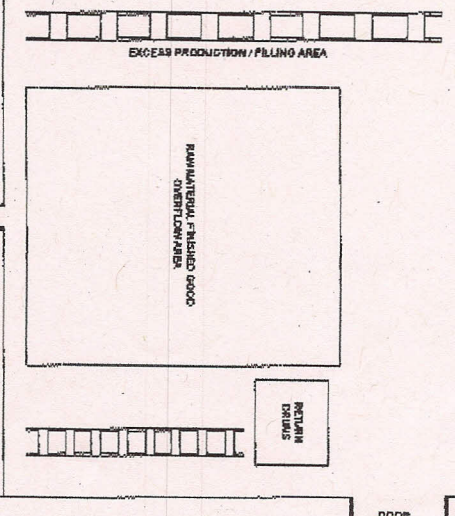
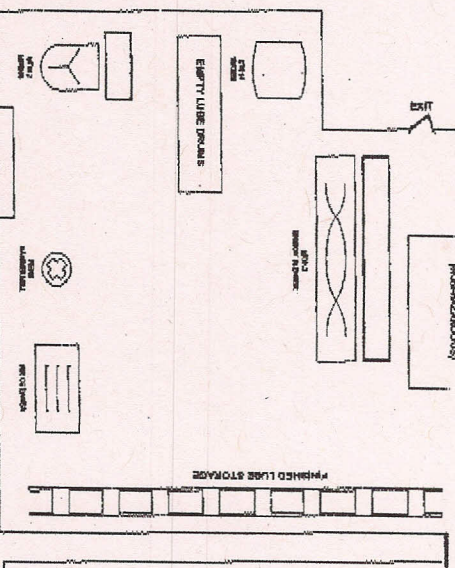
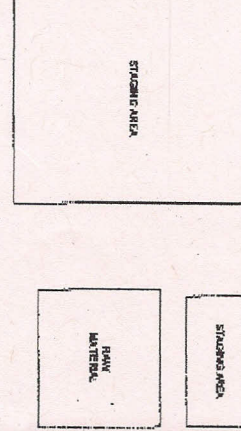
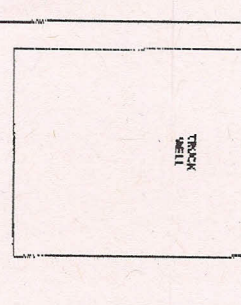
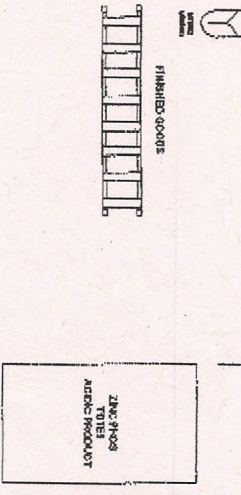
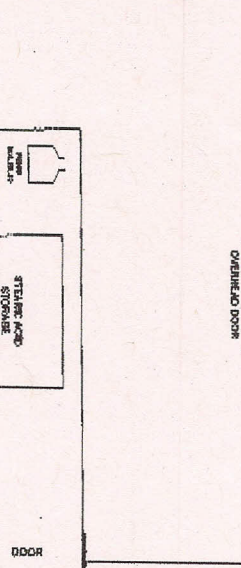
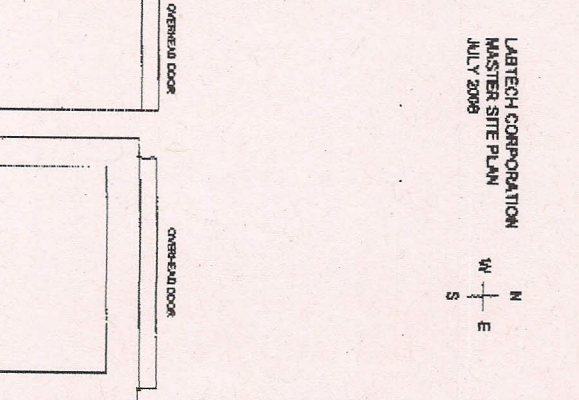
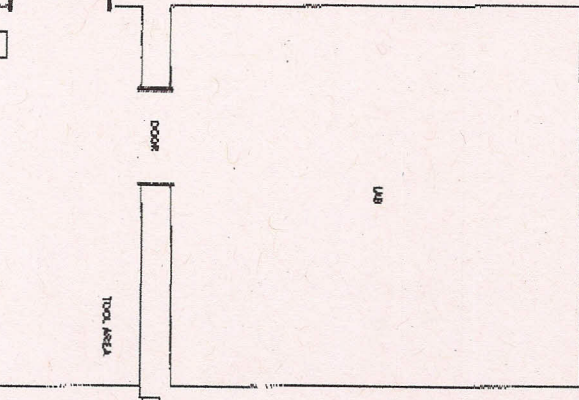
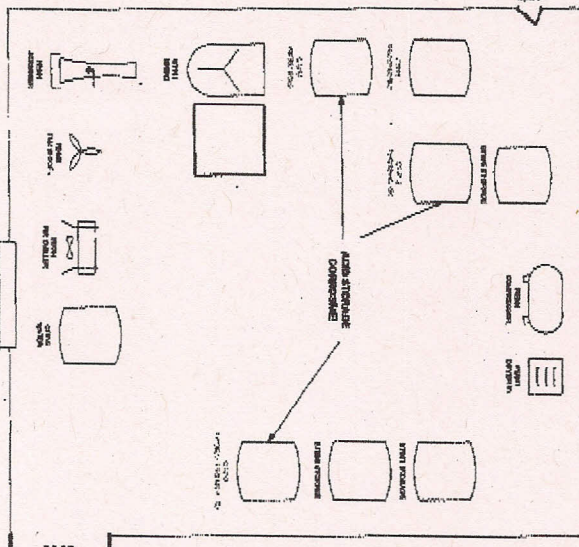
EXIT

THE VULCAN OFFICE

THE COBALT OFFICE

THE LABTECH OFFICE

LABTECH CORPORATION
MASTER SITE PLAN
JULY 2009





NOTICE OF INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and the
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME LABTECH GROUP INDUSTRIES
DATE 6/18/08	INSPECTOR NO.	DAILY SEQ. NO.		
4. INSPECTOR ADDRESS United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604				5. FIRM ADDRESS 7707 LYNDON ST. DETROIT, MI 48238

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE <i>William A. Sandstrom</i>		RECIPIENT SIGNATURE <i>Dennis Bryce</i>	
NAME WILLIAM A. SANDSTROM		NAME DENNIS BRYCE	
TITLE TECHNICIAN	DATE SIGNED 8/11/08	TITLE PRES.	DATE SIGNED 6-18-08